

UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RE:

KAREN STROW

: BKY. NO. 19-13546-MDC  
:  
: CHAPTER 13

AMENDED MOTION TO MODIFY PLAN

1. Debtor filed this Chapter 13 Petition on **May 31, 2019**.

2. This court has jurisdiction over this Motion filed pursuant to 11 USC Section 1329(d)(1) to allow the filing of a Modified Plan after confirmation to be in excess of 60 months and up to 84 months.

3. This Plan is being filed for the following reasons:

a. As a result of Covid-19 the debtor's suffered a loss of income and she was unable to make Trustee payments for several months and struggled to pay her mortgage and utilities.

b. Debtor's husband's income has been substantially reduced as a result of loss of work hours due to covid.

c. Debtor can pay the Trustee payments but needs additional time to complete the payments under her confirmed plan.

d. Debtor is requesting that the Court allow his plan to be extended to a total of 84 months.

4. Debtor's amended plan does not pay unsecured creditors any less money than the Plan previously confirmed by this Court.

**WHEREFORE**, debtor prays for the court to approve the filing of the Modified Plan.

BY: /s/ Michael P. Kelly

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